



SAXENA WHITE

March 10, 2023

VIA ECF

MEMO ENDORSED.

Honorable Ona T. Wang
United States Magistrate Judge
for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re Vertiv Holdings Co Securities Litigation*, No. 1:22-cv-3572-GHW-OTW

Dear Judge Wang:

We represent Lead Plaintiffs¹ in the above-referenced matter. We write this letter with the consent of Defendants² to seek (1) an extension of the page limit for Lead Plaintiffs' omnibus memorandum in opposition to Defendants' motion to dismiss to 50 pages; and (2) a mutual 10-day extension to file Lead Plaintiffs' opposition to Defendants' motion to dismiss and Defendants' reply papers in further support of the motion.

First, pursuant to Defendants' January 18, 2023 letter motion for leave to file excess pages that was granted by the Court on January 19, 2023, Lead Plaintiffs respectfully request, with Defendants' consent, a similar extension of the page limit for their omnibus memorandum in opposition to Defendants' motion to dismiss. *See* ECF Nos. 51-52. Specifically, Lead Plaintiffs request 50 total pages for their omnibus memorandum, given that Defendants filed one 44-page omnibus memorandum on behalf of all Defendants in addition to one 6-page memorandum on behalf of the Platinum Defendants. *See* ECF Nos. 54, 56.

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Second, the parties have conferred and have agreed to a mutual 10-day extension of time for the filing of Lead Plaintiffs' opposition to Defendants' motion to dismiss and Defendants' reply. The Court's November 22, 2022 Order (ECF No. 41) set forth the following briefing schedule for Defendants' motion to dismiss: (i) Defendants' opening papers were to be filed by January 20, 2023; (ii) Lead Plaintiffs' opposition papers were to be filed by March 21, 2023; and (iii) Defendants' reply papers were to be filed by April 20, 2023. The parties respectfully request that the pending deadlines be extended as follows:

¹ Lead Plaintiffs are Louisiana Sheriffs' Pension & Relief Fund, Orlando Police Pension Fund, City of Plantation General Employees Retirement System, Riviera Beach Municipal Firefighters' Pension Trust Fund, and City of Riviera Beach General Employees' Retirement System.

² Defendants are Vertiv Holdings Co, Rob Johnson, David Fallon, Gary Niederpruem, David Cote, Joseph van Dokkum, Roger Fradin, Jacob Kotzubei, Matthew Louie, Edward L. Monser, Steven S. Reinemund, Robin L. Washington, J.P. Morgan Securities LLC, Goldman Sachs & Co. LLC, Citigroup Global Markets Inc., VPE Holdings, LLC, Vertiv JV Holdings LLC, PE Vertiv Holdings LLC, Platinum Equity, LLC, Platinum Equity Investment Holdings, LLC, Platinum Equity Investment Holdings Manager, LLC, Platinum Equity InvestCo, L.P., Platinum Equity Investment Holdings IC (Cayman), LLC, Platinum InvestCo (Cayman), LLC, Platinum Equity Investment Holdings III, LLC, and Platinum Equity Investment Holdings Manager III, LLC.

Hon. Ona T. Wang

March 10, 2023

Page 2 of 3

(i) Lead Plaintiffs shall file their opposition papers to Defendants' motion to dismiss by March 31, 2023; and

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(ii) Defendants shall file their reply in support of their motion to dismiss by May 1, 2023.³

This 10-day extension is necessary due to, among other things, conflicts in the schedules of counsel with respect to other matters. This requested extension will not affect or alter the date of any other event or deadline already fixed by Court order, or otherwise affect the schedule of the case, as discovery is stayed pursuant to the Private Securities Litigation Reform Act and there are no other events or deadlines currently scheduled. This is the first request to extend the above deadlines. *See* ECF No. 23.

We appreciate the Court's consideration of these requests.

Respectfully submitted,

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³ A 10-day extension for Defendants' reply to be filed would be Sunday, April 30, 2023. Accordingly, the parties are proposing May 1, 2023 for the modification to this deadline.

Hon. Ona T. Wang

March 10, 2023

Page 3 of 3

Application **GRANTED** for leave to file excess pages and for an extension of time for Plaintiffs' opposition and Defendants' reply.

The Clerk of Court is respectfully directed to close ECF 57.

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Lead Counsel for Lead Plaintiffs and the Class

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'Ona T. Wang', written in a cursive style.

U.S.M.J. Ona T. Wang 3/13/23